



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

181763



AUG 10 2000

**CERTIFIED MAIL—  
RETURN RECEIPT REQUESTED**

Carrie J. McGowan, Program Manager  
Waste and Remediation  
ISP Environmental Services, Inc.  
1361 Alps Road  
Wayne, New Jersey 07470

**Re: LCP Chemicals, Inc. Superfund Site, City of Linden, Union County, New Jersey**

Dear Ms. McGowan:

Enclosed is a Bill for Collection (No. 022900T059) in the amount of \$58,222.68 for Environmental Protection Agency ("EPA") response costs incurred at the LCP Chemicals, Inc. Superfund Site ("Site") from May 27, 1999<sup>1</sup> through March 31, 2000. This Bill is being transmitted pursuant to the reimbursement provisions set forth in Section XX, Paragraph 76 of the AOC.

Also enclosed is an itemized cost summary and narrative statement concerning the costs contained in the Bill, and a SCORE\$ Report—the latter being a computer-generated breakdown of the different categories of costs incurred by EPA at the Site.

You will notice that the accounting of costs for the Response Action Contract contractor contains items identified as "annual allocation costs." Annual allocation costs are contractor costs that have been incurred by EPA but were not billed to EPA by its contractors on a site-specific basis. Pursuant to the Annual Allocation Reporting Process, EPA is presently determining, for each of its Superfund contracts, the amount of monies that were paid to the contractors that were not payments for

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<sup>1</sup> The effective date of the Administrative Order on Consent ("AOC") for the Site, Index No. II-CERCLA-02-99-1015, signed by the Environmental Protection Agency ("EPA") and ISP Environmental Services, Inc. ("ISP") under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (CERCLA), 42 U.S.C. §9601, *et seq.*, was May 26, 1999. Pursuant to the terms of the AOC, the Respondent shall reimburse the United States for all response costs which are incurred by EPA *after* the effective date of the AOC.

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site-specific activities by the contractors, but rather, were payments for administrative and other non-site costs. EPA is allocating certain of these non-site-specific payments among the various Superfund sites that the contractors were working on at the time, based on the direct costs associated with each site.

Pursuant to Section XX, Paragraph 76 of the AOC, you are responsible for remitting payment of the amount due within thirty (30) days from the date of your receipt of this Bill.

The terms of the AOC indicate that payment is to be made either by certified check or electronic funds transfer ("EFT"), however, EPA requests that the amount due be sent to EPA's account at Mellon Bank via EFT. To effect this payment via EFT, please follow the instructions in Section XVIII, Paragraph 64 of the AOC.

To ensure that your payment is properly recorded, you should send a letter, within one week of the EFT, which references the date of the EFT, the payment amount, the name of the site, the case number, and your name and address to:

Patricia Simmons, Remedial Project Manager  
Central New York Remediation Section  
U.S. Environmental Protection Agency  
Region II  
290 Broadway, 20th Floor  
New York, NY 10007-1866

as well as to:

Muthu S. Sundram, Esq.  
Assistant Regional Counsel  
Office of Regional Counsel  
U.S. Environmental Protection Agency  
Region II  
290 Broadway, 17th Floor  
New York, NY 10007-1866

The United States reserves its right to recover any costs incurred during the time period covered by this accounting but not included in this Bill, and all other response costs pursuant to the AOC.

Finally, under the Superfund Administrative Reform on improving the management of work performed by consenting parties, EPA has reaffirmed its commitment to conduct appropriate and cost-effective oversight while ensuring protective cleanups. EPA believes that maintaining an open dialogue with potentially responsible parties about oversight expectations and performance issues can improve the efficiency of response actions and minimize the costs of oversight. To this end,

EPA would like to offer to discuss with you its plans for the oversight of ongoing and upcoming work at the Site. Please contact Ms. Simmons at (212) 637-3865 or Mr. Sundram at (212) 637-3148 within the next two weeks if you are interested in having a conversation or meeting with us on these issues or you have any questions regarding this Bill.

Sincerely yours,

A handwritten signature in cursive script, reading "John E. La Padula", followed by a horizontal line.

John E. La Padula, P.E., Chief  
New York Remediation Branch

Enclosures

**Summary of Costs Incurred by EPA from May 27, 1999 through May 31, 2000  
in Connection with Administrative Order on Consent Index No. II-CERCLA-02-99-2015  
signed by EPA and ISP Environmental Services, Inc.**

**LCP Chemicals, Inc. Superfund Site  
City of Linden, Union County, New Jersey**

The costs outlined in this summary have been incurred by EPA from May 27, 1999 (the effective date of the Consent Order was May 26, 1999) through March 31, 2000. These costs consist of all response costs related to the work required under the AOC.

**Payroll**

This item consists of EPA personnel charges paid by EPA for time spent by EPA employees in, among other things, overseeing performance of the work required by the AOC. See attached Payroll sections of EPA's SCORE\$ Reports.

**Payroll: \$13,646.33**

**Indirect Costs**

Indirect costs are disbursements from the Superfund for the operation and management of the Superfund Program which are not direct costs (*i.e.*, disbursements recorded in individual Superfund site accounts in EPA's financial management system). Indirect costs are allocated to particular Superfund sites by means of a methodology established by EPA Headquarters. The enclosed SCORE\$ Reports include calculations of EPA's indirect costs.

**Indirect Costs: \$29,083.50**

**Travel**

Travel costs include direct expenditures related to site-specific travel charges incurred in connection with the work required under the AOC, including costs of travel to meetings and site inspections.

**Travel: \$83.68**

**Other Expenditures (OTH)**

This item consists of costs associated with contractor support from Integrated Support Systems, Inc. ("ISS") in preparation of the administrative record and file management for the Site, and from Lockheed Environmental Systems and Tech. ("LEST") in preparation of aerial photographs of the Site.

**ISS: \$1,569.72**

**LEST: \$12,955.49**

**Total OTH Costs: \$14,525.21**

**Response Action Contract (RAC)**

This item consists of costs paid by EPA in connection with work performed by Camp, Dresser & McKee ("CDM") for oversight of ISP's performance of the work required under the AOC, including reviewing site reports and work plans, and site visits.

**CDM: \$883.96**

**Total EPA Response Costs from 5/27/99 through 5/31/00: \$58,222.68**